

**MINUTES OF THE**  
**NATIONAL OFFSHORE SAFETY ADVISORY COMMITTEE**

**MEETING HELD APRIL 19, 2001**

A meeting of the National Offshore Safety Advisory Committee (NOSAC) was held on April 19, 2001 at the Department of Transportation Nassif Building. The meeting began at 9:00 a.m. and ended at approximately 3:15 p.m. The meeting was videotaped for the permanent record, and was announced in the Federal Register on Thursday, March 22, 2001 (FR Volume 66, Number 56, Pg. 16086).

Representing the Coast Guard (USCG) were CAPT Peter Richardson, Executive Director of NOSAC, and Mr. James Magill, Assistant to the Executive Director.

The following Committee members were present:

Mr. Robert Alario	Mrs. Wanda Parker
Mr. Chuck Bedell	Mr. Kenneth Dawson
Mr. Philip Nuss	Mr. John Ryan, III
Ms. Nicki Candies	Mr. Mark Witten
Mr. Ned Stevenson	Mr. Paul Liberato

The following Committee members were absent:

Mr. Bernie Stewart	Dr. Ross Saxon
Mr. Don Ray	Ms. Joan Bondareff (resigned January 4, 2001)

**OPENING REMARKS**

Chairman Ryan opened the meeting by welcoming everyone and having the Committee and audience introduce themselves. He explained the general guidelines for the meeting and asked that speakers please adhere to the allotted time scheduled on the agenda. He then began his opening remarks by giving up-to-date facts and the status of the offshore industry, including information about oil prices, rig counts, new construction and facts on deepwater activities. Chairman Ryan, on behalf of the Committee, recognized CAPT Richardson for his excellent work as Executive Director of NOSAC during the past two years, and presented him with a plaque from the Committee.

CAPT Richardson gave the Coast Guard's opening remarks indicating that he was serving two roles today: his normal role as Executive Director of NOSAC, and also as the NOSAC Sponsor on behalf of RADM Robert North, the Coast Guard's Assistant Commandant for Marine Safety and Environmental Protection. He explained that, due to another commitment, RADM North was unable to attend and that he gave his regrets for not being able to attend the meeting. CAPT Richardson said that RADM North was retiring next Friday (27<sup>th</sup> April) and that this would have been his last meeting as Sponsor of NOSAC. RADM Pluta will be taking over as Coast Guard's

Assistant Commandant for Marine Safety and Environmental Protection and as Sponsor of NOSAC, effective May 6, 2001. RADM Pluta is no stranger to the offshore industry having had previous staff engineer tours at the Eighth District Merchant Marine Technical (mmt) Office in New Orleans, and at the MMT Division at Coast Guard Headquarters in Washington, where he specialized in plan review of commercial vessels for service in the offshore industry, petrochemical, cargo and passenger industries. RADM Pluta is presently Commander of the Eighth Coast Guard District in New Orleans and Commander of Maritime Defense Command Eight, headquartered also in New Orleans. CAPT Richardson had briefed RADM Pluta about NOSAC and he was confident that RADM Pluta was extremely interested in NOSAC's activities and would make every effort to attend future meetings.

CAPT Richardson informed the Committee that this would also be his last meeting as Executive Director of NOSAC, as he would be moving on to other endeavors. He said it had been an honor for him to serve as Executive Director during this last two years. He felt that while he was unable to do all that he had set out to do, major progress had been achieved on issues important to the industry, despite the frustration of the uncertainties surrounding approval of membership slates. CAPT Richardson personally thanked members of the Committee for their continued, unselfish support and valuable contributions to the Committee in these difficult times. CAPT Richardson said it was a pleasure to introduce his replacement, CAPT Michael Brown, their new Executive Director of NOSAC and new Chief of the Office of Operating and Environmental Standards. CAPT Brown had just finished his latest assignment as a professor at the Industrial College of the Armed Forces located at Fort McNair, where he focused on shipbuilding within both domestic and international communities. CAPT Brown was anxiously awaiting CAPT Richardson's departure so he could jump into activities of NOSAC. CAPT Richardson said he was confident that the Committee would give CAPT Brown the same enthusiastic support and cooperation that they had afforded CAPT Richardson over this past two years.

CAPT Richardson thanked everyone for attending the meeting and he hoped that everyone would be able to take full advantage of the topics and discussions planned for the day. He pointed out that NOSAC was a non-funded, DOT discretionary, federal advisory committee, and its effectiveness is due primarily to the member's dedication and hard work. He encouraged everyone to continue their active participation on future Committee endeavors.

CAPT Richardson commented on the status of the Charter renewal, the Committee's membership and the new slate. He said that the Charter was signed on January 11, 2001 and it is effective for two years. He reported that NOSAC had four positions that expired in January 2001, after only 18 months of duty. He reported that a good group of applicants had been received and the selection package would be submitted to the Department of Transportation for approval shortly. We have high hopes that the new administration will be very responsive to our requests for approval of slates and we do not anticipate any delays like we had in the past.

CAPT Richardson then took the opportunity to announce and give details of a public "Listening Session on FPSOs" to be held jointly with the MMS on Thursday, 3 May 2001, to be held in Houston, TX. He encouraged all interested parties to attend and submit comments for discussion at the session or to the docket if unable to attend the meeting.

In closing, CAPT Richardson, commenting on the agenda, said that the Committee would be addressing a wide array of subjects, and he encouraged everyone to participate in the discussions and not hesitate to ask questions of the various speakers, or to offer their insight on issues.

## **SUBCOMMITTEE REPORTS**

**IMO/ISO Issues Subcommittee:** Mr. Alan Spackman gave this report on behalf of Mr. Bernie Stewart, who was unable to make the meeting. Mr. Spackman gave a very comprehensive report on the matters discussed at various IMO Committee and Subcommittee meetings that had taken place recently. These meetings included: the 43<sup>rd</sup> session of the Subcommittee on Stability and Load Lines and Fishing Vessels Safety (SLF 43), the 82<sup>nd</sup> session of the Legal Committee, the 5<sup>th</sup> session of the Subcommittee on Radiocommunications and Search and Rescue (COMSAR 5), the 45<sup>th</sup> session of the Subcommittee on Fire Protection (FP 45), the 32<sup>nd</sup> session of the Subcommittee on Standards of Training and Watchkeeping (STW 32), and the 6<sup>th</sup> session of the Subcommittee on Bulk Liquids and Gasses (BLG 6). Mr. Spackman pointed out that he had included in his report a list of “Entry into Force of Amendments to IMO Conventions” and a list giving the “Status of Pending Instruments and Amendments to Conventions”. Mr. Spackman briefly mentioned some “Private Sector” standards that had recently been issued, such as the International Electrotechnical Commission (IEC) standards on Electrical installations of Ships and Mobile Offshore Units.

Mr. Spackman concluded by briefly commenting on the activities of the International Organization for Standardization (ISO). He pointed out that his report listed standards recently issued by the Petroleum and Natural Gas Industries Committee (TC67). Of particular note from this list were: ISO 17776 “Offshore production installations – Guidelines on tools and techniques for hazard identification and risk assessment”, and ISO 15544 “Offshore production installations – Requirements and guidelines for emergency response”. He explained that his report also included a list of TC67 standards that are being balloted.

Mr. Bedell and CAPT Richardson congratulated Mr. Spackman for this outstanding report and thanked IADC for allowing Alan to spend the time and effort to produce this report every six months.

Mr. Alario also congratulated Mr. Spackman for his great work in preparing his report. He cautioned that the companies must be aware of all the IMO/ISO standards and to get involved to make sure these standards do not create excessive burdens on the offshore industry.

**Prevention Through People (PTP) Subcommittee:** Mr. Don Ray, Subcommittee chairman, could not attend the meeting due to illness and Mr. Jim Magill of the Coast Guard gave a brief report on his behalf.

CAPT Richardson suggested that the title of the Task Statement be changed to “Crew Alertness in the Offshore Industry”. CAPT Richardson explained that this title would be similar to that

used by the Towing Vessel Safety Advisory Committee (TSAC) and would more closely reflect the work the Subcommittee was tasked to do.

Chairman Ryan made a motion to change the title of the Task Statement to “Crew Alertness in the Offshore Industry”. The motion was seconded and unanimously passed.

Mr. Magill said that Mr. Ray’s work over this past six months involved “gathering material” for the work of the Subcommittee. Mr. Ray sent out a letter to the Subcommittee asking for suggestions on the material he should request from the Coast Guard. Using suggestions from this letter, Mr. Ray then sent a letter, dated 9 January 2001, to the Coast Guard requesting five specific items needed by the Subcommittee. Mr. Magill then got to work and, through a number of submittals, provided Mr. Ray with the five requested items, as well as other material he thought might be useful to the Subcommittee. Having put together a package of 14 items, Mr. Ray sent this 2-inch thick package to each of the ten Subcommittee members with a cover letter dated March 30, 2001. Mr. Magill complimented Mr. Ray on the hard work and effort that he put into putting together this comprehensive package. As outlined in his cover letter to the Subcommittee, Mr. Ray’s plan now is to have the Subcommittee review the package during the next six months and then have a Subcommittee meeting the day before the next NOSAC meeting. At the next Subcommittee meeting, Mr. Ray would hope to be able to start writing a report giving comments and recommendations to the Coast Guard.

**USCG/OMSA Task Force on Development and Implementation of STCW Convention for OSVs:** Mr. Robert Alario reported on the current status of the work of the task force on the application of STCW criteria to offshore supply vessels (OSVs) and related vessels in the OSV industry. He said he was pleased to report that the Offshore Marine Service Association (OMSA), working with the Coast Guard, had completed all work necessary to license OSV mariners (Master, Mate, Chief Engineer, and certain ratings forming part of a navigation watch) for compliance with STCW for operation in domestic waters. The work left to do was to provide provisions for licensing mariners working in international waters. Mr. Alario said that the task group had submitted to the Coast Guard’s National Maritime Center (NMC) a package of proposed STCW implementation interpretations for mariners working in international waters. At present, mariners with existing licenses are allowed to operate vessels in international waters. Mr. Alario pointed out that a good number of practical questions had arisen concerning compliance with STCW, and he would submit them to the Coast Guard for resolution. He cautioned that STCW was a very complex set of requirements with a multitude of possible interpretations. He suggested that the Coast Guard should not take an extremely rigid and high interpretation of the requirements to the extent that they would impose an excessive burden on the industry.

**Incident Reporting Subcommittee:** Mr. Bud Danenburger of MMS introduced Ms. Melinda Mayes, the author of the MMS rulemaking on Incident Reporting. Ms. Mayes gave a status report on the MMS rulemaking. She said that the Coast Guard and MMS had been working together for about two years to harmonize the requirements of both agencies and reduce duplication of reporting by industry. Ms. Mayes pointed out that one beneficial aspect of the

rulemaking would allow web based reporting of incidents by industry. Ms. Mayes said that the rulemaking was in MMS clearance and it would be difficult to predict when the NPRM (Notice of Proposed Rule Making) would be published.

**Pipeline-free Anchorages Subcommittee:** Mr. John Ryan, Subcommittee chairman, introduced Mr. Richard Sillcox of the National Oceanic and Atmospheric Administration (NOAA). Mr. Sillcox gave a very informative presentation on NOAA's new "Print on Demand Charts". He said that these new charts incorporate all critical corrections from weekly Notice to Mariners as well as unpublished critical safety information. These charts will be very up-to-date as compared to the old BA charts, which can be as much as twenty-two weeks out of date. Mr. Sillcox said the new charts are available from retail agents and a list of the agents and charts can be obtained from the Print-on-Demand Web page at:

<http://chartmaker.noaa.gov/POD>

Mr. Sillcox then gave an update on the status of NOAA's work on putting MMS pipeline information on the traditional charts. He reported that the good news was all MMS pipeline information had been put on the charts. The bad news was that only one third of the charts have been printed as new editions, so only the new edition charts will have the pipelines shown on them. The printing of the other two-thirds of the charts will have to wait until NOAA has time and money to print new editions.

**Deepwater Activities Subcommittee:** Subcommittee chairman Mr. Chuck Bedell reported that the second Subcommittee meeting was held on April 18, 2001, at Coast Guard HQTRS, with about 20 people in attendance, including Subcommittee members, Coast Guard and members of the public. Mr. Bedell said that the Subcommittee reviewed the minutes of the previous meeting and, for the benefit of those not present at the first meeting, he called upon Mr. Jim Magill to read/review the Task Statement. The Subcommittee reviewed and accepted the definition of "RISK", which had been supplied by the Coast Guard. Mr. Bedell reported that CAPT Ryan, Commanding Officer of Marine Safety Office, Morgan City, had offered to submit information from his staff on practical work they had encountered relating to deepwater activities. MMS had also provided Mr. Bedell with information on their projection of how deepwater activities are expected to grow in the next decade. Mr. Bedell said that the Subcommittee discussed their concern of vessels colliding with deepwater facilities, and noted that a previous NOSAC Subcommittee had studied this subject and produced a report, that would be used by this Subcommittee. No other new areas for study by the Subcommittee had been submitted to Mr. Bedell or the Coast Guard since the last meeting.

Mr. Bedell said that LT Greg Purvis of the Coast Guard Search & Rescue Office (G-OPR) gave a very interesting and informative presentation to the Subcommittee. There were some questions to LT Purvis about the Coast Guard's "Deepwater Program". This program has no direct relationship to the oil & gas deepwater activities, but is the Coast Guard's planned program for carrying out its many duties in the future in deepwater. Mr. Bedell explained that the Coast Guard's "Deepwater Program" would, among many other issues, involve future plans for search and rescue by helicopter of deepwater facilities. Communication, ability for helicopters to refuel during long trips to deepwater facilities and availability of maps of facilities were discussed during LT Purvis's presentation.

Mr. Bedell said that the Subcommittee discussed lifesaving appliances on deepwater facilities. The feeling of the Committee was that the deepwater facilities were better equipped with lifesaving appliances than near-shore facilities.

The Subcommittee also discussed Safety Zones around deepwater facilities. Mr. Bedell said the Subcommittee felt that Safety Zones were important as they were good educational and warning tools for those who would pay attention, but they could not protect ships from actually colliding with offshore facilities. The question was posed, with no answer, as to why industry was not asking the Coast Guard for more safety zones. Mr. Bedell said the Subcommittee would check more into this.

In conclusion Mr. Bedell said that he planned to draft up a final report using CAPT Ryan's input and any other input from the Subcommittee. He hoped to have a strawman of the final report by the next NOSAC meeting, and the final report by the meeting after that.

## **OTHER BUSINESS**

**Subchapter N Status Report:** Mr. James Magill gave a report on the status of the main Subchapter "N" rulemaking and the USCG/MMS Fastrack rulemaking designating MMS to perform inspections and enforcement of fixed OCS facilities on behalf of the Coast Guard.

On the main Sub N rulemaking, he reported that after two extension requests, the comment period had been extended until November 30, 2000, giving approximately an 11 month comment period. He said that 112 comment letters had been received and the Coast Guard had started the process of reviewing the comment letters.

Mr. Magill then gave a status report on the new, but separate, rulemaking project revising the current Sub "N", to authorize MMS to act on behalf of the Coast Guard to inspect and enforce the regulations on fixed OCS facilities. He said that since the last NOSAC meeting, the NPRM had been completed and extensively reviewed by MMS and Coast Guard and it was now at the DOT Secretary awaiting publication. It had been hoped it would have been published by now, but because of the new administration's procedures for regulatory review, it was taking longer than expected. Mr. Magill explained that after the NPRM was published, the review of any comments received would then take place and it was hoped to have the Final Rule published shortly thereafter. Mr. Magill pointed out that to complete the process of having MMS perform the inspection and enforcement of fixed facilities, MMS and the Coast Guard would have to revise the MOU to reflect the items that will be performed by MMS. It was also planned that MMS inspectors would attend some Coast Guard training schools to get familiar with Coast Guard inspection procedures.

**MMS Record of Decision on FPSOs:** Mr. Bud Danenburger of MMS gave a short report on the status of their Record of Decision (ROD) for FPSOs. He indicated that there was still some legal review and letters to be sent out to the coastal states regarding their comments to the Environmental Impact Statement, but he thought it should be out within a week.

Mr. Magill asked if it would be published in the Federal Register? Mr. Don Howard of MMS explained that the plan was to have a Press Release ready at the time the ROD is published.

CAPT Richardson asked Mr. Danenburger if he could explain what the ROD is, and what will happen when it is published? Mr. Danenburger said that the ROD just reflects MMS's learning of what has come out of the EIS.

**Current CG Initiatives on Crew Fatigue:** LT Scott Calhoun of the Coast Guard Office of Design and Engineering Standards, Human Element and Ship Design Division (G-MSE-1), gave an excellent presentation on the current Coast Guard initiatives on crew fatigue. He described the work being done by the Coast Guard G-MSE-1 office and the Coast Guard's Research and Development Center on the Crew Endurance Management Program, and the Crew Alertness Campaign (CAC). LT Calhoun explained that the CAC was the first process being used under the program to reduce the incidents of crew fatigue and increase mariner alertness. He went on to say that in order to successfully implement this program, we must work with the entire marine industry to increase everyone's awareness, education, and understanding about crew fatigue issues.

Committee members Mr. Alario, and Captain Rodney of Gulf Coast Mariners Association, congratulated LT Calhoun on his presentation and the Coast Guard for getting involved in the Crew Alertness Campaign.

**Automatic Identification System (AIS):** Mr. Jorge Arroyo of the Coast Guard Office of Vessel Traffic Management (G-MWV), gave a very informative presentation on the new hardware and software technology making up the Automatic Identification System (AIS). He also described the Coast Guard's regulatory project to implement the IMO SOLAS Chapter V requirements on AIS.

Mr. Arroyo said he hoped to have a Notice of Proposed Rule Making (NPRM) published by the end of the summer of 2001. The cost of a complete system per vessel was around \$10,000, but this should become cheaper as more units are manufactured and sold. Mr. Arroyo said that the Coast Guard was not going to require that the AIS units be fitted to MODUs or fixed platforms, but they were not going to stop them from being fitted either.

Mr. Spackman asked two questions. He said that SOLAS Chapter V requires the Coast Guard to apply AIS to self-propelled MODUs. His first question was, in light of the fact that the Coast Guard had said they were not going to apply AIS to MODUs, was the Coast Guard going to apply an exemption for self-propelled MODUs? Mr. Arroyo said he did not have an answer to this question, but invited Mr. Spackman to address this question in his comments to the NPRM. Mr. Spackman also asked if the Coast Guard was going to require both the carriage and usage of AIS equipment? Mr. Arroyo answered that the NPRM will address the carriage issue, but he did not think the usage issue would be stressed.

**U.S. Navy Water Fog Fixed Fire Extinguishing System:** Dr. Fred Williams, Director of the Navy Technology Center for Safety and Survivability at the Naval Research Laboratory Washington, DC, gave a presentation on his research work on water fog fixed fire extinguishing

systems. Dr. Williams described the many tests and work they had done on an old ship used for the fire tests. The water fog system they had developed would use a 1,000 psi high pressure system. Dr. Williams said that the water mist system could be used in place of the now outlawed Halon system. He also pointed out that the system, if employed on a ship before a weapon exploded, could reduce by about 50% the energy effect of the explosion. The water fog system also had less of a detrimental affect on electrical equipment than the ordinary water extinguishing systems.

Mr. Ryan asked if there was any commercial use yet of the water fog system? Dr. Williams answered that a lot of the new cruise ships were using the system.

Mr. Meyer commented that Shell had used the water mist system on some of their tension leg platforms.

## **PUBLIC COMMENT**

**Survival Craft Sizing:** Mr. Rick Meyer of Shell said that they had performed a study to find the average size of the Shell fixed platform offshore workers. The study revealed that the average worker's weight was 210 pounds and the average hip-to-hip measurement was 19.5 inches. This compared to 165 pounds and 14.1 inches required for Coast Guard certification. He said that Shell was in the process of down sizing the capacity of their lifeboats to meet the criteria from the study. The information had been sent to Mr. Markle of the Coast Guard Lifesaving and Fire Safety Division (G-MSE-4) for his consideration. Mr. Meyer said that this was an important issue and he would encourage the Committee to take a pro-active position on this subject. He suggested that the Committee could either create a Subcommittee to study the subject or have the Coast Guard give a presentation on the results of their review.

**OSV Manning:** Ms. Penny Adams, representing Gulf Coast Mariners Association (GCMA), proposed two issues under this agenda item. The first was a proposed discussion for consideration by the Committee on a union issue involving a legal matter with a private company. Both the Chairman and Executive Director expressed their concern over the appropriateness of such an issue before this Committee. Before permitting Ms. Adams to proceed with this issue at this time, the Executive Director decided to first seek a legal interpretation on whether an issue of this nature could be put forth for consideration by the Committee under the Federal Advisory Committee Act (ACT). So as not to delay the meeting or shut the door on this issue, the Executive Director suggested that GCMA submit a letter to the Coast Guard with details of the issue and request this interpretation.

The second issue involved engine room manning on offshore supply vessels (OSVs). Ms. Adams indicated that an engineer had given her a report on work hours, which addressed an issue of the Coast Guard accepting, in some cases, four-man crew when six would be needed. She said that she would like to see the manning kept up to standard as manning was a fatigue factor.



**IMO on Accidents During Testing of Lifeboats:** Mr. Alan Spackman, International Association of Drilling Contractors (IADC), pointed out that IMO Subcommittee on Ship Design and Equipment (DE) was going to take up the issue of accidents occurring during in-service testing of lifeboats and other survival craft. He explained that the problem arose because the in-service testing was patterned after the prototype testing and was developed long before totally enclosed lifeboats were introduced. He said the conditions under which we are doing tests now are vastly different than when the criterion was first developed. Mr. Spackman said it would be good to have the industry's concerns brought to the attention of NOSAC and the Coast Guard, so that it can be taken to IMO as a U.S. position. Mr. Spackman would like to see the IMO include some information on the in-service testing of lifeboats.

Chairman Ryan said that he would take this as an action item for the next meeting.

**Recommendation on Coast Guard Budget for Offshore Activities:** Mr. Mark Witten made a motion that the Committee make a recommendation to whoever is responsible for Coast Guard funding, that sufficient, dedicated funds be provided to send Coast Guard headquarters and Eighth District personnel involved in offshore activities to the annual Offshore Technology Conference. The motion was seconded and was passed unanimously.

Mr. Alario proposed that a letter be sent to the Coast Guard requesting additional funding/personnel be allocated for offshore activities.

Mr. Bedell said that one of the recommendations the Deepwater Subcommittee is likely to make is that an Offshore Activities Branch be formed at headquarters dedicated solely to offshore activities. He said that if we are to continue as a leader at IMO and other international forums, we must dedicate sufficient funds and personnel to make sure the U.S. remains able to influence international rules, such as IMO and ISO.

Mr. Ryan said that during his 27 years in the industry, he had seen many changes in personnel setups at headquarters and at Eighth District. He said that since offshore activities had gotten busier lately and would likely keep busy, an Offshore Activities Branch at headquarters and offshore liaison officer at Eighth District, would be very helpful in meeting the offshore industry's need.

## **NEXT MEETING/ADMINISTRATIVE ITEMS**

**Date/Location for Next Meeting :** The next NOSAC meeting is scheduled for November 8, 2001, in New Orleans, at the Coast Guard Marine Safety Office, 1615 Poydras Street. Subcommittee meetings will be held on November 7, 2001.

## Summary of Action Items:

### ITEM

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| 1. At next NOSAC meeting, arrange for discussion on IMO in-service testing of lifeboats.        | Jim Magill  |
| 2. Write letter to Coast Guard requesting additional funding/personnel for offshore activities. | John Ryan   |
| 3. At next NOSAC meeting, arrange for briefing to NOSAC on Coast Guard Deepwater Project.       | Jim Magill  |
| 4. At next NOSAC meeting, arrange for presentation on Shell request on lifeboat capacity.       | Jim Magill  |
| 5. At next NOSAC meeting, arrange for Coast Guard brief/update on Crew Alertness Campaign.      | Jim Magill  |
| 6. Submit to PTP Subcommittee Chairman Don Ray, GCMA's "Engineering Manning of OSVs"            | Penny Adams |

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Peter Richardson, CAPT, USCG  
Executive Director

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Mr. John Ryan, III  
Chairman